UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 2

DATE: June 7, 2006

SUBJECT: Perchlorate Remedial Investigation Work Plan for Shieldalloy

FROM: Michael Clemetson, Environmental Scientist

Hazardous Waste Support Branch

To: Trevor Anderson, Remedial Project Manager New Jersey Remediation Branch (ERRD-NJRB)

As per your request, we have reviewed the "Perchlorate Remedial Investigation Work Plan," prepared by TRC Environmental Corporation, dated March 2006, for the Shieldalloy Metallurgical Corporation (SMC) site located in Newfield, Gloucester County, New Jersey.

Background information will be represented by one sampling location for each of the different media (soil, sediment, and surface water). Further discussion should be provided to justify whether one location is appropriately representative.

Figure 3-4 illustrates the proposed surface water and sediment sampling locations. It is unclear why there are no samples proposed for the pond located in the southwestern corner of the site. Additionally, clarification should be included regarding why no samples are proposed for the drainage swale which appears to connect this pond to the former lagoon area. One sediment and surface water sample location is proposed for Burnt Mill Pond. Further information should be provided to explain why only one sample is proposed for this pond. It may be useful to discuss the selection process for all of the sampling locations.

It is noted that there are no numerical remediation standards for perchlorate for soil or sediment. Further discussion should be incorporated regarding how these sampling data will be assessed/utilized.

It is noted that the investigation will determine the extent of perchlorate in local receptors. Clarification should be provided concerning this statement.

If you have any questions, comments, or require further information, please contact me at (732) 321-6712.